

FILED 08 JUN '22 15:17 USDC-ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:22-cr-00213-MO

v.

INDICTMENT

JOHN DOE # 1 a.k.a. "Bunny Jinn,"
JENNIFER McCONNON, and
SYDNEY SLEIGHT,

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C),
841(b)(1)(E)(i), 841(b)(2), and 846

Forfeiture Allegation

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Distribute and Possess with Intent to
Distribute Controlled Substances)

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(b)(2), and 846)

Beginning on or about January 2020, and continuing through on or about September 16, 2021, within the District of Oregon and elsewhere, defendants **JOHN DOE # 1 a.k.a. "Bunny Jinn," JENNIFER McCONNON, and SYDNEY SLEIGHT**, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others both known and unknown to the Grand Jury, to carry out the following objects in furtherance of the conspiracy:

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Indictment

Objects of the Conspiracy

The conspirators did knowingly and intentionally combine, conspire, confederate, and agree to distribute and possess with the intent to distribute real and counterfeit pills and tablets containing various Schedule II, Schedule III, and Schedule IV controlled substances, to include:

1. Tapentadol, a Schedule II controlled substance;
2. Lorazepam, a Schedule IV controlled substance;
3. Alprazolam, a Schedule IV controlled substance;
4. Clonazepam, a Schedule IV controlled substance;
5. Diazepam, a Schedule IV controlled substance;
6. Carisoprodol, a Schedule IV controlled substance;
7. Ketamine, a Schedule III controlled substance; and,
8. Tramadol, a Schedule IV controlled substance,

in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C), 841(b)(1)(E)(i), and 841(b)(2).

Manner and Means of the Conspiracy

The defendants, and others known and unknown to the grand jury, were members of a vast international drug distribution organization being run out of India that was illegally distributing and possessing with the intent to distribute hundreds of thousands of real and counterfeit pills containing various Schedule II, Schedule III, and Schedule IV controlled substances that were being sent into and throughout the United States for purposes of further distribution, including within the District of Oregon. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. Defendant **JOHN DOE # 1 a.k.a. "Bunny Jinn,"** as an organizer, leader, manager, and supervisor of an overseas drug distribution organization being run out of India, would arrange, coordinate, and export packages of real and counterfeit pills and tablets containing various controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol into and throughout the United States, including within the District of Oregon, for purposes of further distribution.

2. Defendants **JENNIFER McCONNON** and **SYDNEY SLEIGHT** would, operating within the District of Oregon, receive, transport, store, repackage, conceal, possess with the intent to distribute, and then distribute pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol to customers throughout the United States.

3. It was part of this conspiracy for defendants **JOHN DOE # 1 a.k.a. "Bunny Jinn," JENNIFER McCONNON,** and **SYDNEY SLEIGHT** to utilize encrypted messenger applications, cellular telephones, and text messaging services to communicate and further the distribution and possession with the intent to distribute pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol.

4. It was part of this conspiracy for defendants **JENNIFER McCONNON** and **SYDNEY SLEIGHT** to maintain premises in Keizer, Oregon for the purposes of storing, packaging, possessing with the intent to distribute, and distributing pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol, all Schedule II, III and IV controlled substances.

5. It was part of this conspiracy for defendant **JENNIFER McCONNON** to utilize a Post Office Box located in Keizer, Oregon to receive packages of pills containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol for purposes of further distribution.

6. It was part of this conspiracy for defendant **JENNIFER McCONNON** to utilize PayPal, CashApp, and Zelle to receive payments for distributing and possessing with the intent to distribute pills containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol.

Overt Acts

In furtherance of this conspiracy, and to effect and accomplish its objectives, the defendants and other co-conspirators committed one or more of the following overt acts:

1. Beginning on or about January 2020, the exact date being unknown, and continuing through September 16, 2021, defendant **JOHN DOE # 1 a.k.a. "Bunny Jinn"** organized, led, managed, supervised, and ran an international drug trafficking organization in which, utilizing international shipping companies and various communication messenger services, he coordinated the distribution and possession with the intent to distribute real and counterfeit pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol into and throughout the United State, to include the District of Oregon.

2. Beginning on or about January 2020, and continuing through September 16, 2021, defendants **JENNIFER McCONNON** and **SYDNEY SLEIGHT**, would, within the District of Oregon, possess with the intent to distribute and distribute to customers throughout the United

States real and counterfeit pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol.

3. Beginning on or about January 2020, and continuing through September 16, 2021, within the District of Oregon, defendant **JENNIFER McCONNON** rented and maintained a Post Office Box in Keizer, Oregon for the purpose of receiving approximately 275 shipments of controlled substances, to include real and counterfeit pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol for purposes of further distribution.

4. Beginning on or about April 2020, and continuing through September 16, 2021, within the District of Oregon, defendants **JENNIFER McCONNON** and **SYDNEY SLEIGHT** rented and maintained an apartment within Keizer, Oregon for purposes of receiving, storing, repackaging, possessing with the intent to distribute, and distributing real and counterfeit pills and tablets containing controlled substances, to include Tapentadol, Lorazepam, Alprazolam, Clonazepam, Diazepam, Carisoprodol, Ketamine, and Tramadol.

5. On or about September 9, 2021, the exact date being unknown to the grand jury, defendant **JOHN DOE # 1 a.k.a. "Bunny Jinn,"** was responsible for the shipment of a box of pills and tablets containing Tapentadol, a Schedule II controlled substance, that arrived at the UPS store located at 1685 Salem Industrial Drive, Salem, Oregon and weighed approximately 33 kilograms, that was intended to be delivered to defendant **JENNIFER McCONNON** for purposes of further distribution.

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6. On or about September 14, 2021, defendant **JENNIFER McCONNON**, within the District of Oregon, reached out to the UPS store in Salem, Oregon to request the box identified above in Overt Act number 5 be delivered to her Post Office Box located in Keizer, Oregon.

7. On or about September 16, 2021, within the District of Oregon, defendants **JENNIFER McCONNON** and **SYDNEY SLEIGHT** possessed for the purposes of further distribution tens of thousands of real and counterfeit pills and tablets containing the following controlled substances:

- a. Tapentadol, a Schedule II controlled substance;
- b. Lorazepam, a Schedule IV controlled substance;
- c. Alprazolam, a Schedule IV controlled substance;
- d. Clonazepam, a Schedule IV controlled substance;
- e. Diazepam, a Schedule IV controlled substance;
- f. Carisoprodol, a Schedule IV controlled substance;
- g. Ketamine, a Schedule III controlled substance; and,
- h. Tramadol, a Schedule IV controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), 841(b)(1)(E)(i), 841(b)(2), and 846.

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COUNT 2

**(Possession with the Intent to Distribute Schedule II Controlled Substances)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(C))**

On or about September 16, 2021, within the District of Oregon, defendants **JENNIFER McCONNON** and **SYDNEY SLEIGHT** did knowingly and intentionally possess with the intent to distribute Tapentadol, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

**(Possession with the Intent to Distribute Schedule III Controlled Substances)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(E)(i))**

On or about September 16, 2021, within the District of Oregon, defendants **JENNIFER McCONNON** and **SYDNEY SLEIGHT** did knowingly and intentionally possess with the intent to distribute Ketamine, a Schedule III controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i).

COUNT 4

**(Possession with the Intent to Distribute Schedule IV Controlled Substances)
(21 U.S.C. § 841(a)(1) and 841(b)(2))**

On or about September 16, 2021, within the District of Oregon, defendants **JENNIFER McCONNON** and **SYDNEY SLEIGHT** did knowingly and intentionally possess with the intent to distribute:

1. Lorazepam, a Schedule IV controlled substance;
2. Alprazolam, a Schedule IV controlled substance;
3. Clonazepam, a Schedule IV controlled substance;
4. Diazepam, a Schedule IV controlled substance;
5. Carisoprodol, a Schedule IV controlled substance;

6. Tramadol, a Schedule IV controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(2).

FORFEITURE ALLEGATION
(Controlled Substance Offenses)

Upon conviction of an offense in Counts 1, 2, 3 and/or 4, defendants **JOHN DOE # 1**
a.k.a. "Bunny Jinn," JENNIFER McCONNON, and SYDNEY SLEIGHT shall forfeit to the
United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds
obtained, directly or indirectly, as a result of the aforesaid violations and any property used, or
intended to be used, in any manner or part, to commit, or to facilitate the commission of said
violations.

Dated: June 8, 2022.

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHAUG
United States Attorney


SCOTT M. KERIN, OSB # 965128
Assistant United States Attorney